

## DISTRICT ATTORNEY KINGS COUNTY

350 JAY STREET BROOKLYN, NY 11201-2908 (718) 250-2000 WWW.BROOKLYNDA.ORG

> [INSERT NAME] Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]

Kings County Dkt./Ind. No. [########]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: MICHAEL SHER

MOS TAX:

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move <u>in limine</u> to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

## Disclosure # 1:

MOS SHER PLEAD GUILTY TO THE FOLLOWING CHARGES AND SPECIFICATIONS, WHILE ASSIGNED TO THE 120<sup>TH</sup> PRECINCT:

- SAID MOS SHER, ON OCTOBER 18, 2015, HAVING BEEN DIRECTED BY A NEW YORK CITY POLICE SERGEANT, TO
  OPERATE A DEPARTMENT VAN TO RESPOND TO THE SCENE OF A VEHICLE ACCIDENT DID FAIL AND NEGLECT
  TO IMMEDIATELY COMPLY WITH SAID ORDER.
- SAID MOS SHER, WHILE ON DUTY ON NOVEMBER 10, 2015, DID FAIL AND NEGLECT TO BE PROPERLY ATTIRED
  WHILE WEARING HIS UNIFORM, TO WIT: MOS SHER FAILED TO WEAR A DEPARTMENT UNIFORM TIE AND
  SHIRT WHILE ON DUTY AND INSTEAD WORE HIS OWN SWEATER.
- SAID MOS SHER, WHILE ON-DUTY ON NOVEMBER 10, 2015, HAVING BEEN DIRECTED BY NEW YORK CITY
  POLICE SERGEANT, TO PUT ON HIS POLICE UNIFORM, FAILED TO DO SO UNTIL APPROXIMATELY FORTY-FIVE
  (45) MINUTES LATER AFTER HAVING BEEN ORDERED TO DO SO A SECOND TIME.
- SAID MOS SHER, WHILE ON-DUTY ON NOVEMBER 10, 2015, HAVING BEEN DIRECTED TO TAKE A SECURITY POST, WAS ABSENT FROM SAID ASSIGNMENT WITHOUT PERMISSION OR POLICE NECESSITY FROM 1500 HOURS UNTIL 1545 HOURS.
- SAID MOS SHER, ON NOVEMBER 17, 2015, DID FAIL AND NEGLECT TO SAFEGUARD HIS 2015 DEPARTMENT RESTRICTED PARKING PERMIT, TO WIT: THE PERMIT WAS DISPLAYED IN HIS VEHICLE BY HIS GIRLFRIEND WHO BORROWED THE VEHICLE AND THEN PARKED IT AT A METER AND DID NOT DISPLAY A RECEIPT OF PAYMENT FOR THE METER.
- 6. SAID MOS SHER, ON NOVEMBER 17, 2015, DID WRONGFULLY ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT, TO WIT: HE PLACED AN UNAUTHORIZED PLASTIC COVER OVER THE FRONT AND REAR LICENSE PLATE OF HIS CAR PLACED THE VEHICLE'S REGISTRATION STICKER INSIDE OF A FOIL BAG AND AFFIXED IT TO THE WINDSHIELD.
- SAID MOS SHER, ON JANUARY, 2015 DID WRONGFULLY ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT, TO WIT: HE FAILED TO RETURN HIS 2014 DEPARTMENT PARKING PERMIT TO HIS INTEGRITY CONTROL OFFICER AS REQUIRED AND LIED TO SAID OFFICER BY INDICIATING THAT HE HAD RETURNED THE PERMIT.
- 8. SAID MOS SHER, ON NOVEMBER 19, 2015, DID WRONGFULLY ENGAGE IN CONDUCT PREJUDICIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARTMENT, TO WIT: HE PLACED AN UNAUTHORIZED PLASTIC COVER OVER THE REAR LICENSE PLATE OF HIS CAR, THIS BEING A CAR SEPARATE AND DISTINCT FROM THAT MENTIONED IN "#6" ABOVE. AND PLACED THE VEHICLE'S REGISTRATION STICKER INSIDE OF A FOIL BAG AND AFFIXED IT TO THE WINDSHIELD.

9. SAID MOS SHER, ON OR ABOUT OCTOBER 10, 2015 AND THROUGH NOVEMBER 25, 2015, DID WRONGFULLY ENGAGE IN CONDUCT PREJUDIUCIAL TO THE GOOD ORDER, EFFICIENCY AND DISCIPLINE OF THE DEPARMTENT, TO WIT: MOS SHER OPERATED A MOTORCYCLE WITH A MUTILATED LICENSE PLATE AND ONLY TWO OF THE LICENSE PLATE NUMBERS WERE LEGIBLE. ACTION TAKEN: MOS SHER FORFEITED THIRTY (30) VACATION DAYS AND PLACED ON DISMISSAL PROBATION FOR ONE YEAR CASE CLOSED ON 3/15/17 **Disclosure #2 (PENDING):** MOS SHER WAS SUSPENDED BY NYPD IN RELATION TO ONGOING INVESTIGATION ARISING FROM AN ALLEGATION THAT ON OR ABOUT 05/30/20, IN BROOKLYN, IN ADDITION, THE FOLLOWING CHARGES AND SPECIFICATIONS, ARISING FROM AN INCIDENT ON 5/30/20, ARE PENDING AGAINST MOS SHER, WHILE ON DUTY AND ASSIGNED TO THE 70<sup>TH</sup> PRECINCT: Disclosure #3 (PENDING): THE FOLLOWING ALLEGATIONS, DATED 1/27/21, ARE PENDING AGAINST MOS SHER: BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH FEBRUARY 2<sup>ND</sup>, 2021, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER: **Disclosure #4:** CCRB CASE: 201402962 REPORT DATE: 03/28/2014 Disclosure #5 (PENDING): CCRB CASE: 202003703 REPORT DATE: 05/31/2020